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5 Attorneys for Defendant  
6 TARGET CORPORATION

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

10 Kelle Hernandez ) Case No. 2:21-cv-02146-WBS-AC  
11 Plaintiff(s), )  
12 vs. ) **STIPULATION FOR EXTENSION OF**  
13 Target Corporation and Does 1 to 50 ) **DEADLINES AND ORDER**  
14 Defendant(s). )

WHEREAS, under the Initial Pretrial Scheduling Order in this action (Docket No. 7), discovery, including depositions, is set to close on January 3, 2023 and all motions are due to be filed by February 14, 2023.

19 The parties have been actively engaged in discovery including written discovery and  
20 depositions. However, there are still depositions to complete and based upon availability of the  
21 witnesses and counsel, the depositions cannot be coordinated before February 2023, which is after  
22 the current discovery deadline. Additionally, the deposition testimony is necessary before  
23 proceeding with motions, including a potential motion for summary judgment.

24 THEREFORE, it is hereby stipulated and agreed that the current discovery cut-off date  
25 of January 3, 2023 shall be extended to March 17, 2023.

26 IN ADDITION, the parties hereby stipulate and agree that the current motion filing  
27 deadline, including dispositive motions, of February 14, 2023 be extended to April 28, 2023.

28 | //

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1 IN ADDITION, the parties hereby stipulate and agree that the current pretrial conference  
2 date of April 24, 2023 be continued to July 31, 2023.

3 IN ADDITION, the parties hereby stipulate and agree that the current trial date of June 21,  
4 2023 be continued to October 10, 2023.

5  
6 Dated: December 30, 2022

MILLER INJURY ATTORNEYS

7 By: /s/ John Miller  
8 John C. Miller, Esq.  
9 Attorneys for Plaintiff  
KELLE HERNANDEZ

10  
11 Dated: December 29, 2022

MORDAUNT, ROUNDY, REIHL & JIMERSON

12  
13 By: /s/ Lori Reihl  
14 Lori A. Reihl, Esq.  
15 Attorneys for Defendant  
TARGET CORPORATION

16 ORDER

17  
18 Good cause having been shown,

19 IT IS HEREBY ORDERED that the parties to this matter that the court's Scheduling Order  
20 relative to this matter is modified as follows:

- 21 1. The current discovery cut-off date of January 3, 2023 is extended to March 17, 2023.  
22 2. The deadline to file motions of February 14, 2023 is extended to April 28, 2023.  
23 3. The pretrial conference date of April 24, 2023 is continued to July 31, 2023 at 1:30 p.m.  
24 4. The jury trial date of June 21, 2023 is continued to October 11, 2023 at 9:00 a.m.

25  
26 Dated: January 4, 2023

27   
28 WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE